



Feedback from the European Marine Board Secretariat to the European Commission's consultation on the [Roadmap towards Nature Credits](#)

(22 September 2025)

The European Marine Board (EMB) Secretariat is supportive of the EC's efforts to explore additional approaches for protecting and valuing nature. We are also encouraged by the recognition of the importance of supporting and informing the initiative by sound science.

We are happy to see the marine ecosystems and nature users and the EU Ocean Pact mentioned. However, the marine environment has different ecosystems and uses to those on land, and marine sectors contend with additional challenges from cross-border operations, which need to be appropriately considered. We therefore call for inclusion of the marine perspective throughout the process. This should include relevant marine expertise within the proposed Expert Group, and collaboration with wider stakeholders, in addition to the European Board on Agriculture and Food, for the development of nature credits.

We need to be able to value (marine) ecosystems and the services they provide in order to properly integrate them into economic systems. The EMB Future Science Brief on 'Valuing Marine Ecosystems' (<https://www.marineboard.eu/publications/valuing-marine-ecosystem-services-%E2%80%93-taking-account-value-ecosystem-benefits-blue>) presents clear recommendations which are relevant to this initiative, such as: creating open databases that contain the data, meta-data, applied methodology and results of (marine) ecosystem valuation studies (monetary as well as non-monetary); setting the appropriate scales and boundaries, since the beneficiaries of the ecosystem services under consideration might lie outside the administrative boundaries; and developing the Natural Capital Approach to enhance and standardise existing (marine) asset and valuation data sets, assessment methods and results.

EMB's Position Paper on Coastal resilience (<https://www.marineboard.eu/publications/building-coastal-resilience-europe>) highlights Nature-based Solutions for coastal protection and restoration that are also relevant to this initiative, including the need for the multiple social and economic values of natural capital to be reflected in public policies and decision-making processes. The document also highlights that a stable regulatory and policy environment, high quality, investible projects, and ways to overcome the higher risk associated with Ocean sectors are needed to finance a sustainable Ocean economy. In order to support Nature-based Solutions financially, the global economy needs to be aligned with sustainability goals, and this roadmap is a positive step towards this vision.

EMB's flagship Position Paper 'Navigating the Future VI' (<https://www.marineboard.eu/publications/nfvi>) advises that cost benefit analyses should be conducted, comparing losing resources due to overexploitation and other human activities with the present cost of restoring them through greater resource control. These analyses will help demonstrate the (economic) value of restoration and nature-positive practices, justify investment and opening the door for private finance.

In order to measure any biodiversity outcomes arising from credited nature-positive actions, you need to be able to observe what the situation was before and as a result of the action. This means that the Nature Credit initiative will be heavily reliant on sustained and comprehensive observations and mapping. Appropriate support should be provided to ensure the observing system is fit-for-purpose. For more information on the needs of the Ocean observing system (<https://www.marineboard.eu/publications/sustaining-situ-ocean-observations-age-digital-ocean>) and for marine biological monitoring (<https://www.marineboard.eu/publication/strengthening-europes-capability-biological-ocean-observations>), see the respective EMB publications.

Finally, to support implementation of this initiative it will be important to offer relevant training to professionals involved in the different steps: e.g. certification; monitoring, reporting and verification; and crediting.